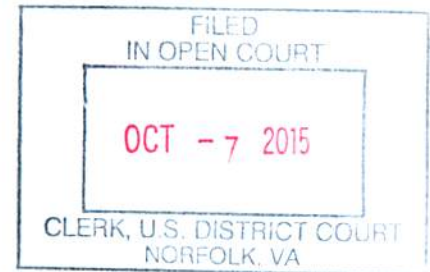


IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
Norfolk Division



UNITED STATES OF AMERICA	)	<u>UNDER SEAL</u>
	)	
v.	)	Criminal No. 2:15cr 131
	)	
CHRIS ARTHUR PERRY JR.	)	18 U.S.C. § 371
(Counts 1, 2, 3, 6, 7)	)	Conspiracy
	)	(Count 1)
GREGORY PAUL WINGARD JR.	)	
(Counts 1, 4, 5, 6)	)	18 U.S.C. §§ 659 and 2
	)	Theft of Interstate Shipments
Defendants.	)	by Carrier
	)	(Counts 2, 4, 6)
	)	
	)	49 U.S.C. §§ 46314(a) and (b)(2)
	)	Entering an Aircraft or Airport Area
	)	with Intent to Commit a Felony
	)	(Counts 3, 5, 7)
	)	
	)	18 U.S.C. § 981(a)(1)(C) by 28 U.S.C. §
	)	2461
	)	Criminal Forfeiture

INDICTMENT

September 2015 Term -- At Norfolk, Virginia

COUNT ONE

THE GRAND JURY CHARGES THAT:

During the period from in or around December 2013 up until on or about June 4, 2015, the exact dates being unknown, in the Eastern District of Virginia and elsewhere, CHRIS ARTHUR PERRY JR. (hereinafter "PERRY") and GREGORY PAUL WINGARD JR. (hereinafter "WINGARD") unlawfully and knowingly combined, conspired, and agreed with other persons, both known and unknown to the Grand Jury, to commit the following against the United States:

- A. Theft of Interstate Shipments by Carrier, in violation of 18 U.S.C. § 659 and;
- B. Entering an Aircraft or Airport Area with Intent to Commit a Felony, in violation of 49 U.S.C. §§ 46314(a) and (b)(2).

Object of the Conspiracy

The object of the conspiracy was for the defendants and their co-conspirators to steal items from checked baggage on US Airways flights leaving or arriving at the Norfolk International Airport and then selling those stolen items for a profit primarily using pawn shops in the Tidewater area.

Ways, Manner, and Means of the Conspiracy and the Scheme and Artifice to Defraud

1. It was part of the conspiracy for PERRY and WINGARD to use their positions as baggage handlers working for Envoy Services to break into checked baggage in the secure area of the Norfolk International Airport to find United States Currency or other valuable items, usually in the internal luggage spaces of airplanes, and remove those items from the airport.
2. It was part of the conspiracy for PERRY, WINGARD and unindicted co-conspirator S.N. to sell said items to members of the community or to pawn shops in the Tidewater area.
3. It was part of the conspiracy for PERRY and WINGARD to target firearms containers to specifically steal the guns inside.
4. It was part of the conspiracy for PERRY and WINGARD to then switch the baggage tags for the purloined firearm containers with another baggage tag from an unrelated bag which resulted in the firearm containers being transported to a remote airport from the originally intended destination to prevent detection from law enforcement.

Overt Acts

1. On or about April 3, 2014, in the secure area of the Norfolk International Airport, in the Eastern District of Virginia, a co-conspirator stole a firearm, that is a Taurus Millineum Pro handgun from a piece of checked baggage on US Airways Flight 3842 departing from Norfolk, Virginia and arriving in Philadelphia, Pennsylvania.

2. On or about April 3, 2014, in the secure area of the Norfolk International Airport, a co-conspirator switched the baggage tag from the now empty firearm container with another bag located in the secure area of the airport, which resulted in the empty firearm container being sent to Nashville, Tennessee instead of its intended location of Miami, Florida via Philadelphia, Pennsylvania.

3. On or about April 16, 2014, in the secure area of the Norfolk International Airport, PERRY stole jewelry including two crucifixes from a piece of checked baggage on US Airways Flight 1977 departing from Norfolk, Virginia and arriving at Douglass Field, Charlotte, North Carolina with a final destination of Cleveland Hopkins Field, Ohio on US Airways Flight 2675.

4. On or about April 16, 2014, in the City of Chesapeake, Virginia, unindicted co-conspirator S.N. pawned the two crucifixes which were stolen from a piece of checked baggage located in the secure area of the Norfolk International Airport.

5. On or about May 24, 2014, in the secure area of the Norfolk International Airport, a co-conspirator stole a firearm, that is a Smith and Wesson nine millimeter handgun, from a piece of checked baggage on US Airways Flight 3799 departing from Norfolk, Virginia and arriving at Douglas Field, Charlotte, North Carolina and connecting to US Airways Flight 1791 arriving in Tampa, Florida.

6. On or about May 24, 2014, in the secure area of the Norfolk International Airport, a co-conspirator switched the baggage tag from the now empty firearm container with another bag located in checked baggage, which resulted in the empty firearm container being sent to Charles DeGaulle Airport, Paris, France instead of its intended location of Tampa, Florida.

7. On or about June 12, 2014, in the secure area of the Norfolk International Airport, a co-conspirator stole a firearm, that is a Smith and Wesson .357 caliber firearm, from a piece of checked baggage on US Airways Flight 1977 departing from Norfolk, Virginia and arriving at Douglas Field, Charlotte, North Carolina and connecting to US Airways Flight 1866 arriving in West Palm Beach, Florida.

8. On or about June 12, 2014, in the secure area of the Norfolk International Airport, a co-conspirator placed the now empty firearm container in another bag originally intended to travel to Minneapolis, Minnesota and then switched that baggage tag from the bag that now contained the empty firearm container with another bag located in checked baggage, which resulted in the empty firearm container being sent to Los Angeles, California instead of its intended location of West Palm Beach, Florida.

9. On or about January 7, 2015, in the secure area of the Norfolk International Airport, a co-conspirator stole a firearm, that is a .45 caliber ALP Springfield handgun, from checked baggage on US Airways Flight 1906 departing from Norfolk, Virginia and arriving in Douglas Field, Charlotte, North Carolina and connecting to US Airways flight 2047 arriving in New Orleans, Louisiana.

10. On or about January 7, 2015, in the secure area of the Norfolk International Airport, a co-conspirator switched the baggage tag from the now empty firearm container with another bag

located in checked baggage, which resulted in the empty firearm container being sent to Birmingham, Alabama instead of the intended destination of New Orleans, Louisiana.

11. On or about February 14, 2015, in the secure area of the Norfolk International Airport, WINGARD stole a firearm, that is a .357 caliber Smith and Wesson handgun from checked baggage on US Airways Flight 3842 departing from Norfolk, Virginia and arriving in Philadelphia, Pennsylvania and connection to US Airways Flight 3965 arriving in Bangor, Maine.

12. On or about February 14, 2015, in the secure area of the Norfolk International Airport, WINGARD switched the baggage tag from the now empty firearm container with another bag located in checked baggage, which resulted in the empty firearm container being sent to Boston, Massachusetts instead of its intended location of Bangor, Maine.

13. On or about April 5, 2015, in the secure area of the Norfolk International Airport, PERRY removed a backpack issued by the United States Navy that contained a Xbox gaming system, a rechargeable battery back for the system and games including but not limited to: Madden 15, NBA2K15, and Destiny from checked baggage, located in the arrivals secure area on US Airways Flight 3963 arriving from Reagan National Airport, Washington, DC. The checked backpack originated from West Palm Beach Airport on US Airways Flight 4458 to Reagan National Airport before continuing to its final destination at Norfolk International Airport.

14. On or about April 5, 2015, in the secure area of the Norfolk International Airport, PERRY discarded the baggage tag from the checked backpack in a waste bin and then took the backpack, containing the gaming system and games to his car located in the employee parking lot.

15. On or about April 6, 2015, in Norfolk, Virginia, WINGARD pawned two Xbox games entitled Madden 15 and Destiny.

16. On or about April 6, 2015, in Chesapeake, Virginia, PERRY pawned two Xbox wireless controllers, one Xbox battery pack and one AC adapter.

17. On or about April 11, 2015, in Norfolk, Virginia, PERRY pawned one copy of an Xbox game entitled NBA2K15.

(All in violation of Title 18, United States Code, Section 371).

### COUNT TWO

#### THE GRAND JURY CHARGES THAT:

On or about April 16, 2014, in Norfolk, Virginia, in the Eastern District of Virginia, defendant CHRIS ARTHUR PERRY JR., aided and abetted by unindicted co-conspirator S.N., unlawfully, willfully and knowingly, and with intent to convert to their own use, did steal, take and carry away from a US Airways Passenger Plane Flight 1977, in the Norfolk International Airport, goods and chattels of a value in excess of \$1,000, that are jewelry including but not limited to two crucifixes, which were moving as, were a part of, and constituted an interstate shipment of freight and express from the US Airways Corporation at the Norfolk International Airport in the State of Virginia, to the US Airways Corporation at Cleveland Hopkins Field in the State of Ohio.

(In violation of Title 18, United States Code, Sections 659 and 2).

COUNT THREE

THE GRAND JURY CHARGES THAT:

On or about April 16, 2014, in Norfolk, Virginia, in the Eastern District of Virginia, defendant CHRIS ARTHUR PERRY JR. knowingly and willfully entered, in violation of sections 44901, 44903(b), 44903(c) and 44906 of Title 49, an aircraft or an airport area that serves an air carrier or foreign air carrier, with intent to evade security procedures and restrictions and with intent to commit, in the aircraft or airport area, a felony under the law of the United States, to wit: theft of interstate shipment by carrier, as charged in Count Two of this indictment.

(In violation of Title 49, United States Code, Sections 46314(a) and (b)(2)).

COUNT FOUR

THE GRAND JURY CHARGES THAT:

On or about February 14, 2015, in Norfolk, Virginia, in the Eastern District of Virginia, defendant GREGORY PAUL WINGARD JR. unlawfully, willfully and knowingly, and with intent to convert to his own use, did steal, take and carry away from a US Airways Passenger Plane Flight 3842, in the Norfolk International Airport, goods and, that is a .357 caliber Smith and Wesson handgun , which was moving as, was a part of, and constituted an interstate shipment of freight and express from the US Airways Corporation at the Norfolk International Airport in the State of Virginia, to the US Airways Corporation at Bangor in the state of Maine.

(In violation of Title 18, United States Code, Sections 659 and 2).

COUNT FIVE

THE GRAND JURY CHARGES THAT:

On or about February 14, 2015, in Norfolk, Virginia, in the Eastern District of Virginia, defendant GREGORY PAUL WINGARD JR. knowingly and willfully entered, in violation of sections 44901, 44903(b), 44903(c) and 44906 of Title 49, an aircraft or an airport area that serves an air carrier or foreign air carrier, with intent to evade security procedures and restrictions and with intent to commit, in the aircraft or airport area, a felony under the law of the United States, to wit: theft of interstate shipment by carrier, as charged in Count four of this indictment.

(In violation of Title 49, United States Code, Sections 46314(a) and (b)(2)).

COUNT SIX

THE GRAND JURY CHARGES THAT:

On or about April 5, 2015, in Norfolk, Virginia, in the Eastern District of Virginia, defendant CHRIS ARTHUR PERRY JR. aided and abetted by GREGORY PAUL WINGARD JR. unlawfully, willfully and knowingly, and with intent to convert to his own use, did steal, take and carry away from a US Airways Passenger Plane Flight 3963, in the Norfolk International airport, goods and chattels, including an Xbox gaming system and games including but not limited to: Madden 15, NBA2K15 and Destiny, which were moving as, were a part of, and constituted an interstate shipment of freight and express from the US Airways Corporation at the West Palm Beach in the State of Florida, to the US Airways Corporation at the Norfolk International Airport in the State of Virginia.

(In violation of Title 18, United States Code, Sections 659 and 2).



COUNT SEVEN

THE GRAND JURY CHARGES THAT:

On or about April 5, 2015, in Norfolk, Virginia, in the Eastern District of Virginia, defendant CHRIS ARTHUR PERRY JR. knowingly and willfully entered, in violation of sections 44901, 44903(b), 44903(c) and 44906 of Title 49, an aircraft or an airport area that serves an air carrier or foreign air carrier, with intent to evade security procedures and restrictions and with intent to commit, in the aircraft or airport area, a felony under the law of the United States, to wit: theft of interstate shipment by carrier, as charged in Count Six of this indictment.

(In violation of Title 49 United States Code, Sections 46314(a) and (b)(2)).

FORFEITURE ALLEGATION

THE GRAND JURY FURTHER ALLEGES THAT:

1. The defendants, if convicted of any of the violations alleged in Counts 1, 2, 4 and 6 of this Indictment, shall forfeit to the United States, as part of the sentencing pursuant to Federal Rule of Criminal Procedure 32.2, any property, real or personal, which constitutes or is derived from proceeds traceable to the violation.
2. If any property that is subject to forfeiture above, as a result of any act or omission of the defendant, (a) cannot be located upon the exercise of due diligence, (b) has been transferred to, sold to, or deposited with a third party, (c) has been placed beyond the jurisdiction of the Court, (d) has been substantially diminished in value, or (e) has been commingled with other property that cannot be divided without difficulty, it is the intention of the United States to seek forfeiture of any other property of the defendant, as subject to forfeiture under Title 21, United States Code, Section 853(p).

3. The property subject to forfeiture includes, but is not limited to:

A. A monetary judgment in the amount of at least \$12,000, representing the proceeds of Count 1.

(In accordance with 18 U.S.C. § 981(a)(1)(C) by 28 U.S.C. 2461.)

*United States v. Chris Arthur Perry Jr., et al.*  
Criminal No. 2:15cr **131**

A TRUE BILL:

**Redacted**

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FOREPERSON

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